

MOA Guidance Final Draft - May 4, 2001/ Updated April, 2003

**OFFICE OF PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES**

**REGIONAL PRIORITIES & GUIDANCE
FY 2002/ '03/ '04**

- FINAL -
May 4, 2001
(Updated: April, 2003)

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MEMORANDUM

SUBJECT: Final Draft OPPTS National Priorities and MOA Guidance for FY 2002/ '03/ '04

FROM: Stephen L. Johnson,
Assistant Administrator

TO: Regional Administrators, I-X
Regional Division Directors, OPPTS

During FY 2001, the Regions and the OPPTS Headquarters' Program Offices collaborated on designing a new process for developing the guidance for the OPPTS Regional *Memorandum of Agreement* (MOA). I am pleased that the new process has resulted in a participatory dialogue with our regional partners and the Office of Enforcement and Compliance Assistance (OECA). The OPPTS *Lead Region* and *Subleads* have played a major role in drafting the guidance through numerous meetings and conference calls. At their 2001 meeting in Boston, the OPPTS Regional Division Directors discussed the draft MOA guidance and provided valuable input, which has enabled us to arrive at a consensus about our programs' direction and priorities for FY2002/ '03/ '04. The overarching goal of the OPPTS Regional MOA's is to strengthen and enhance our relationships with the Regions that manage our field programs which are delegated to States and Tribes.

Through the MOA's with the Regions, OPPTS continues to address the highest risk reduction possible through the integration of national priorities, regional priorities, and specific geographic and community-based local initiatives. The nurturing of *voluntary* partnerships is a key element of the OPPTS approach. The *Food Quality Protection Act* (FQPA) requires the Office of Pesticide Programs (OPP) to license pesticides, including *Biotech* pesticides, under stringent safety standards. OPPTS is committed to the reduction of environmental pollution from pesticides and the incidents of pesticide poisonings. In order to accomplish these objectives, OPPTS supports the development of partnerships with growers in order to assist them in adopting safer pesticide practices and to expand the cadre of high quality pesticide applicators and health care professionals. To address other key OPPTS pesticide program priorities, we will work jointly with our Regions and State/ Tribal partners to develop plans for preventing and reducing pesticide pollution in our nation's waters and effectively implementing worker safety programs.

A continuing priority for the Office of Pollution Prevention and Toxics (OPPT) is the elimination of childhood lead poisoning. Developing a State, Tribal and Federal infrastructure is key to ensuring that lead hazards are being dealt with safely and effectively. Pollution Prevention (P2) remains a high priority and underscores OPPTS' Federal leadership role for this program and our stewardship responsibility to help Regions advance pollution prevention in all programs. A key element of our P2

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effort is our leadership for the Agency's cross-media *PBT Strategy* aimed at preventing or reducing the nation's burden of *Persistent Bioaccumulative Toxics (PBT's)* in the environment. In addition, through the voluntary, *High Production Volume Challenge Program (HPV)*, OPPTS will greatly enhance public access to information on HPV chemicals and to create a network with our Regional programs and states to collect additional exposure, use, or release data on these chemicals. The ultimate goal of our efforts is to nurture effective partnerships with Regions, States and Tribes in order to ensure a chemically safer nation for all Americans.

The *MOA* is a key mechanism for implementing our national OPPTS goals and objectives as outlined under the Government Performance and Results Act, (GPRA). In addition, with your help, we will have the opportunity to focus our energy on key multi-media activities supported by this AA-ship, including Children's Health, Environmental Justice (EJ), Community Based Environmental Protection (CBEP), NEPPS, and others. OPPTS will continue to re-engineer the way we need to work together to establish a common direction for our programs. Headquarters' programs understand that, on a region-by-region basis, the priorities highlighted in the guidance will require some flexibility in order to accommodate Regional, State, Tribal and local concerns. Based upon the commitments made by each Region, we look forward to an update on the "status of the regional programs" at the OPPTS National Meetings. A final report, which will highlight progress in achieving our objectives for FY 2002/ '03/ '04 is due in November, 2004. OPPTS programs also plan to conduct mid-year "check-ins" with the Regions in order to determine whether any barriers have arisen to MOA implementation.

The Office of Program Management Operations (OPMO) within my Immediate Office, coordinates this effort. Marylouise Uhlig, Associate Assistant Administrator, and her Deputy, Michael O'Reilly, serve as the OPPTS/ IO /MOA contact points and can be reached on 202- 564-0545. For specific program guidance and assistance, please contact Jay Ellenberger, OPP, (703) 305-7099 and Barbara Cunningham, OPPT, (202) 260-1761. Carol Terris, Senior Budget Officer will be available to assist you on any GPRA or budget-related questions (202) 260-2476. The 2004 MOA's are due to be submitted to my office by August 30, 2003.

OPPTS remains committed to this partnership process and believes that our mutual efforts will focus and strengthen our activities in the field. I look forward to working with you on this collaborative endeavor, now and into the future.

Attachments

cc: Deputy Regional Administrators, Regions I-X
OPPTS Regional Branch Chiefs
Assistant Administrators, EPA Headquarters
Office Directors. OPPTS

OFFICE OF PESTICIDE PROGRAMS (OPP)
REGIONAL MOA PRIORITIES AND HIGHLIGHTS

- ▼ **FQPA** requires OPP to license pesticides under stringent safety standards, to develop new science policies to support these standards, and to transition the agricultural community from the use of higher to lower risk pest management strategies,
- ▼ OPP is also licensing new **Biotech** pesticides which promise reduced risks to the public, workers, and the environment,
- ▼ OPP is also working to strengthen worker safety and water quality programs in an integrated way among national pesticide program partners, including EPA regions, states, and tribes,
- ▼ And to implement these outcomes in the agricultural and other regulated communities, three high priority programs with HQ, Regions, States, and Tribes are being implemented:

Agricultural Partnership Initiative *National Objective:* Growers will adopt safer pesticide practices, including the use of *Integrated Pest Management Strategies* (IPM) and biopesticides and lower pesticide levels in food, homes and workplace.

- ▼ The AG Initiative facilitates the implementation of decisions under FQPA.
- ▼ HQ's and Regions work with agricultural communities and USDA to prevent/ reduce pesticide pollution and adopt alternatives to pesticides.

Pesticide Worker Safety Programs *National Objective:* A higher caliber of trained applicators and health care professionals leading to reduced incidents of poisonings and environmental pollution.

- ▼ Regions and States/Tribes maintain programs that promote pesticide worker safety–worker protection, applicator training, and medical community training on recognition and treatment of poisonings
- ▼ Regions collaborate with and monitor States/Tribes as they carry out training programs and work with advocacy, community and training groups to build networks.

Water Quality *National Objective:* All Regions will have plans to collaborate with States and Tribes and *40 States* and *5 Tribes* will have effective plans in place for addressing water quality issues.

- ▼ Full coordination among HQ's Offices, Regions, States, and Tribes on pesticide water issues and identification and implementation of effective programs.
- ▼ At State, Tribal and Regional level, priorities of adverse effects of pesticides in ground and surface water will be identified.
- ▼ Identify and implement programs to prevent or reduce contamination.

**OFFICE OF POLLUTION PREVENTION AND TOXICS (OPPT)
REGIONAL MOA PRIORITIES AND HIGHLIGHTS**

Lead Program: *National Objective:* Eliminate childhood lead poisoning.

Develop state, tribal and Federal infrastructure to ensure lead hazards are being dealt with safely and effectively.

- Increase number of states approved to implement certification/accreditation programs
- Increase number of firms/individuals certified for lead abatement activities
- Coordinate with compliance/ enforcement staff on notifications received concerning upcoming abatement projects

Pollution Prevention/PBT's: *National Objective:* Provide Federal leadership for P2.

Build State/Tribal capacity to prevent pollution at the source and reduce environmental burden of PBT's (mercury, dioxin, etc.)

- Incorporate P2 approaches in regional, state, and tribal programs and manage grants awarded to states and tribes
- Prevent or reduce nation's burden from priority PBTs in the environment

High Production Volume Chemicals: *National Objective:* Greatly enhance public access to information on HPV chemicals.

Build greater awareness and use of information being generated for HPV chemicals.

- Create network with Regional programs and states to collect additional exposure, use, or release data on HPV chemicals
- Encourage states to promote the use of data as they become available

In addition to above priority programs:

Maintenance of Core Program Capacity:

National Objective: Protect the public from unreasonable risks from hazardous chemicals.

Program Objective: Establish core program and flexibility to meet Regional needs in critical OPPT programs, including:

- Durable Fibers (incl Asbestos);
- Polychlorinated Biphenyls ; and
- Tribal toxics and P2 programs.

FY 2002/ '03/ '04 MOA PROCESS & FORMAT

Steps And Milestones

- Planning Workgroups Formed.....Early 2001
- Dallas Meeting to Review Draft Guidance.....March 2001
- Workgroups Submit Revised Guidance/
Present to DD's in Boston.....March 2001
- Regions/ States Review Final Draft.....April 2001
- 2004 MOA's/ MOA Reports**
- Final MOA Guidance Issued.....April 2003
- Regions Submit 2004 MOA's..... Aug 2003
- Hq's and Regions Negotiate Differences..... Sept. 2003
- MOA signed..... Oct. 2003
- MOA Program Updates at Nat'l Meeting.... Nov. 2003
- MOA Final 2002 Report..... Nov. 2002
- 2003 Report Nov. 2003
- 2004 Report Nov 2004
- Planning Groups Reconvene for Development
Of **2005** MOA Guidance..... Nov. 2003

Recommended Format For FY 2002/ '03/ '04 MOA's

- **Transmittal Memo (2-3 pages max.)** which highlights key components of regional plans, including: Summary of Regional commitments in response to OPPTS priorities, anticipated barriers, other concerns and cross-media programs like *EJ*, *CBEP* and *Children's Health*. (*Note: Please address OECA priorities as appropriate*)
- **Attachment** which includes completed tables which display Regional commitments and other key information. (Tables to follow)
- MOA's are to be submitted electronically.

Key MOA Contacts

- Marylouise Uhlig, Associate Assistant Administrator,(202) 564-0545
- Michael O'Reilly, Deputy, OPMO, (202) 564-0545
- Sadie Hoskie, Lead Region Manager (303) 312-6343
- Diane Sanelli, Lead Region Coordinator (303) 312-7822

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- Jay Ellenberger, OPP, (703) 305-7099
- Kennan Garvey, OPP, (703) 305-7106
- Barbara Cunningham, OPPT, (202) 564-8170
- Phil Robinson, OPPT, (202) 564-8824
- Carol Terris, Senior Budget Officer, (202) 564-0535
- Ann Pontius, OECA, (202) 564-6266

MOA Reporting

- The OPPTS National Meeting, 2003, will serve as an opportunity for Regions & Headquarters to discuss MOA implementation.
- MOA Reports Due November 2003/ 04. (Guidance to be issued separately)
- Mid-Year “Check-ins” will be conducted each year. (Details to follow)

OPP'S HIGHEST PRIORITIES FOR REGIONAL PESTICIDE PROGRAM ACTION
FY 2002 -2003-2004
Strategic Agricultural Partnership Initiative

Background

EPA's Strategic Agricultural Initiative began in FY 1998 with \$1 million and 4 FTEs as a pilot program in EPA regions 4, 5, 9, and 10. The pilot was designed to facilitate Food Quality Protection Act (FQPA) implementation. Based on the successful pilots, EPA expanded the program to all regions through a FY 2000 budget initiative for \$1 million. The initiative expanded in FY 2001 to 10 FTEs and \$2 million. The OPPTS Acting Assistant Administrator sent guidance on the use of these resources to the regions in December 2000.

The FY 2002 APG and APM are as follows:

APG: Implementation of 10 -15 model agricultural partnership projects that demonstrate and facilitate the adoption of farm management decisions and practices that provide growers with a "reasonable transition" away from the highest risk pesticides.

APM: 10 -15 model agricultural partnership projects.

Where do we want to be by the end of 2004?

The Agricultural Partnership Initiative is a new effort initiated nation-wide in FY 2000 after earlier pilots to prevent or reduce pesticide pollution in the agricultural sector. This initiative will develop pest management strategies with growers not otherwise reached by USDA and EPA Headquarters. The strategies will identify alternatives to harmful pesticides and assist targeted groups in producing safe food. EPA will implement model agricultural partnership projects that demonstrate and facilitate the adoption of farm management decisions and practices that provide growers with "a reasonable transition" away from the highest risk pesticides -- those pesticides, uses or practices most likely to be lost through FQPA implementation.

What do we need to do to get there?

To achieve these objectives, the regions will:

- ! select an Agricultural Initiative coordinator, using the regional FTE gained through the budget initiative;
- ▼ become knowledgeable on FQPA issues, including the most vulnerable chemical classes and chemicals, and be well informed on the agricultural groups that are well organized to manage FQPA transition issues and are closely linked to USDA and OPP;
- ! build partnerships with targeted producers, commodity groups and other agricultural

stakeholders to manage transition needs created or likely to be created by OPP reregistration decisions, thereby reducing risk from agricultural pesticides; by

- ▼ identifying grower groups and/or commodities that are not well organized for FQPA transition issues;
- ▼ considering cross-media considerations by establishing linkage with regional agricultural sector team or agricultural liaison, and avoiding recommending changes in practices that may increase soil erosion, field burning, etc. as a substitute pest management tool.

In carrying out these activities, regions should:

- ▼ cooperate with USDA in the formation, adoption and use of the Regional Pest Management Centers;
- ▼ capture and share lessons learned particularly with respect to IPM and other methods of reduced pest management; and
- ▼ provide routine feed-back to Headquarters OPP and USDA on producer's pest management issues and concerns.

Headquarters will:

- ▼ provide a focal point of contact and coordination for the Strategic Agricultural Initiative program, including monthly telephone conferences and periodic meetings; and
- ▼ be available to facilitate problem solving and to advocate continued funding for Regional FQPA projects and FTEs.

How will we judge our success?

Regions will establish appropriate measures for each partnership project. Measures may include:

- ▼ Development of an appropriate transition strategy;
- Increases in pre-harvest intervals, less frequent application of targeted pesticides, or other ways to achieve measured reductions in pesticide residues, particularly for commodities consumed by children;
- Transition away from highest risk pesticides, and transition to reduced risk pesticides;
- Measured minor crop grower adoption of new bio-intensive IPM and biological control methods; and
- Growers working cooperatively to exchange pest control methods and share findings.

What barriers must we overcome to achieve our goals?

EPA must overcome the perception among many in the agricultural sector that it is exclusively a regulatory agency, and can serve as a partner in voluntary initiatives.

Both Regional and HQ staffs need to recognize that changes in pest management will occur only with proven cost-effective alternatives, time and training.

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OPP must coordinate closely with the sublead and other regions to ensure an appropriate degree of national consistency in this initiative.

Regions must agree to dedicate the allocated resources to this work and find qualified Agricultural Initiative specialists in each region.

OPP'S HIGHEST PRIORITIES FOR REGIONAL PESTICIDE PROGRAM ACTION

FY 2002 - 2003- 2004

Pesticide Worker Safety Programs

- ▼ **National Guidance for Pesticide Worker Safety Programs (Worker Protection, Pesticide Applicator Certification and Pesticides and National Strategies for Health Care Providers)**

National Goals/Objectives (Where do we want to be by the end of 2004?)

By 2004 all Regions and States will be maintaining integrated pesticide worker safety programs at a “base level” of attainment, and there will be consistent national reporting of annual accomplishments for documenting successful implementation of pesticide worker safety programs.

Means and Strategies (What do we need to do to get there?)

[NOTE: The following activities are considered **High Priority** activities. All Regions must commit to accomplishing these activities for effective pesticide worker safety program implementation.]

Program Oversight and Evaluation - Regions must commit appropriate resources to oversight and evaluation of state pesticide worker safety programs. This includes:

- ▼ Negotiating clear commitments in annual cooperative agreements based on national guidance;
- ▼ Conducting an appropriate number of annual state visits to adequately monitor program, assure program coordination, and document program accomplishments;
- ▼ Conducting an appropriate number of annual oversight inspections to document inspection quality and consistency;
- ▼ Monitoring and/or participating in an appropriate number of applicator training and recertification programs to document training quality;
- ▼ Collecting and submitting annual state accomplishment reports that address national reporting criteria; and
- ▼ Conducting thorough and timely annual reviews to evaluate program effectiveness and assure cooperative agreement commitments and national program objectives are met.

[NOTE: National accomplishment reporting criteria and detailed end-of-year review requirements for pesticide worker safety programs will be provided in the cooperative agreement guidance package.]

Headquarters will develop and issue timely national cooperative agreement guidance that clearly articulates Agency priorities and national reporting criteria for pesticide worker safety programs. Regions should assure state accomplishment reports and regional reviews and are submitted timely to EPA Headquarters. MOA reports should include information on the nature and timeliness of the Region's oversight activities (# of state visits, # of oversight inspections per state, # of applicator training and recertification programs monitored per state, # of states submitting complete accomplishment reports, dates grants were negotiated, dates reviews were conducted and reports completed and mailed to states, etc.).

National Assessment of the Worker Protection Program - Regions must commit appropriate resources (personnel and travel dollars) to assure active participation and involvement in the National Assessment process. This includes participation in assessment workgroups and conference calls that may arise out of assessment process, and active involvement in various activities and/or pilot projects that may be initiated as a result of the assessment. Headquarters will keep Regions apprised of the status of the national assessment and inform Regions of activities they should be participating in. MOA reports should discuss the extent of regional participation and involvement in the National Assessment effort.

Certification and Training Assessment Group (CTAG) - Regions must commit appropriate resources (personnel and travel dollars) to assure active participation and involvement in the CTAG process. This includes participation in CTAG workgroups and conference calls that may arise out of the CTAG process and active involvement in various activities and/or pilot projects that may be initiated as a result of CTAG activities. Headquarters will keep Regions apprised of ongoing CTAG activities and inform Regions of CTAG activities they should be participating in. MOA reports should discuss the extent of regional participation and involvement in the CTAG effort.

State Plans - Regions must assure that all their States have updated, complying State Plans for Certification of Pesticide Applicators in place in accordance with 40 CFR Part 171. Headquarters will work with Regions on coordinating State Plan reviews and publishing Federal Register notices when necessary based on existing policy. MOA reports should clearly document the Region's compliance with the regulatory requirements for maintaining updated State Plans, and should describe annual regional activities and accomplishments in this area.

[NOTE: The following activities are considered **Lower Priority** activities. All Regions should commit to accomplishing these activities for effective pesticide worker safety program implementation or explain why regional resources and priorities do not warrant participation in these activities.]

Working With Advocacy/Community Group Networks - Regions should commit to working with farm worker advocacy/community groups in their Region to build better networks with these groups. Regions should engage in meetings with such groups to discuss and address potential issues of concern, and to improve state and regional relationships with these entities. MOA reports should describe regional activities and accomplishments in this area.

Working With Farm Worker Training Networks - Regions should commit to working with the Association of Farm Worker Opportunity Programs (AFOP), Americorp, and/or other farm worker training providers in their region to develop a relationship with significant farm worker training providers. Regions should engage in meetings with these entities so that Regions are aware of their training activities, can facilitate state involvement, assess training quality, and take part in farm worker training programs as resources allow. MOA reports should describe regional activities and accomplishments in this area.

Regional C&T Workshops - Regions should commit to working with EPA Headquarters and the appropriate State Lead Agency (SLA) and Cooperative Extension Service (CES) C&T/PAT program coordinators to actively plan and participate in the annual regional C&T/PAT meetings applicable to their region. Regions should assure such meetings address regional C&T issues and provide a forum for better coordination between Regions, SLAs and CES offices on the C&T program. MOA reports should describe regional activities in this area.

Pesticides and National Strategies for Health Care Providers Program - Regions should commit to active participation and involvement in the National Strategy for Outreach to Health Care Providers initiative. This includes participation in the 2002 Forum for Developing the National Pesticides Strategy for Outreach to Health Care Providers, and participation on workgroups and conference calls that may arise out of this initiative that may be applicable to the Region. This also includes active involvement in various activities and/or pilot projects that may be initiated as a result of this initiative that may be applicable to the Region. Regions should also commit to working with health care providers in their Region to build better networks, address identified issues and improve state relationships with these entities. Headquarters will keep Regions apprized of the status of the National Strategy for Outreach to Health Care Providers initiative and inform Regions of opportunities for involvement. MOA reports should discuss regional

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participation in the National Strategy for Outreach to Health Care Providers initiative and related activities.

OPP'S HIGHEST PRIORITIES FOR REGIONAL PESTICIDE PROGRAM ACTION

FY 2002 - 2003- 2004

Water Quality

▼ **NATIONAL GUIDANCE**

- ▼ Where do we want to be by the end of 2004?: Coordination exists at the headquarters, regional and state levels and among these levels, on issues where pesticides and water intersect. All levels of government are working toward solutions to problems arising out of overlapping or conflicting authorities and programs or arising out of the lack of authority or programs to address the issue. Headquarters consistently seeks and Regional Offices provide the Office of Pesticide Programs (OPP), Office of Enforcement and Compliance Assurance (OECA), and the Office of Water (OW) with regional perspective and assistance on 1) adverse effects from currently registered pesticides on ground water and surface water, 2) processes needed to avoid and mitigate adverse effects from currently registered pesticides, 3) attaining coordination at the state level among the agencies with water responsibilities.
- ▼ What do we need to do to get there?:
 - ▼ Headquarters will continue coordination efforts with the Office of Water to develop resource guides for Regions and States on ways or options for addressing issues of pesticides and water.
 - ▼ Headquarters will pursue with Regions and States, ways to build on the work and partnerships being developed via the proposed Ground Water Pesticide Management Plan Rule, to address surface water quality issues related to pesticides.
 - ▼ Regions will continue to assist States and Tribes, as appropriate, to develop the generic framework for the Ground Water PMP program.
 - ▼ Regions will develop a Regional plan for working with their States and Tribes to address water quality issues. Regions should consider including in these plans, as appropriate:
 - ▼ Identification of the top priority issues in the Region or within each State and Tribe related to pesticides and water quality
 - ▼ How the Regions will work with the States and Tribes to help address these top priority issues
 - ▼ How the Regional will affect coordination among the offices responsible for pesticide programs and those responsible for water programs at the regional level
 - ▼ Methods the Region will use to affect coordination among State and Tribal level pesticide and water offices.
 - ▼ The Region's assessment of what assistance Headquarters should

provide to the Region related to pesticides and water quality issues.

- ▼ How will we judge our success?:
 - ▼ Headquarters will issue guidance on one or more pesticides and water issues.
 - ▼ A proposal for building on the PMP work and partnerships will be provided to Regions, States and Tribes, as appropriate, for comment.
 - ▼ Concurrence on generic PMPs will be achieved for a total of 40 States and 5 Tribes (currently 25 States and one Tribe).
 - ▼ Regions will have in place, plans for addressing water quality issues with their States and Tribes, as appropriate, and the Sub-lead Region will provide to Headquarters, copies of these plans and an assessment of potential national level priorities based upon these plans.

- ▼ What barriers must we overcome to achieve our goals?: Coordinating overlapping authorities and programs. Overlapping authorities are FIFRA, FQPA, the Safe Drinking Water Act, and the Clean Water Act. Overlapping programs are the Pesticide Program and the Water Program and the Headquarters administered responsibilities under the Endangered Species Act.

LEAD

National Goal: To reduce blood-lead levels in children

Introduction

The major goal for 2002-04 for this evolving program is to continue efforts to gain approval for states and tribes willing to accept the certification/accreditation and training programs, and to operate the federal program efficiently and effectively in states that have not yet been so approved.

RPG: Lead-based Paint Certification and Training Programs - For FY 2002/'03/ '04, continue efforts to reduce exposure to lead-based paint hazards with intent to effect a significant decrease in overall blood-lead levels in children, through our efforts to administer federal programs and oversee state and tribal implementation of programs for lead-based paint abatement certification and training in 50 states, tribal lands, and territories. **(Please make commitments to this Congressional goal or explain why you cannot.)**

Measures of Success - Success in this program relates to our ability to continue to make progress at reducing the prevalence of children being poisoned from lead-based paint exposure. Given that our programs cannot measure directly the results of our efforts with respect to reducing childhood lead poisoning, we must depend on surrogate measures that are "output" oriented as indicators that our programs are making a difference. For example, our efforts to ensure that trained/certified individuals are conducting lead-based paint hazard related work, our efforts to ensure that lead-based paint abatement work is being conducted properly, and our efforts to ensure that disclosure is occurring in real estate transactions are surrogate activities (both programmatic and enforcement) that are considered as indicators. Below is a listing of output activities that regions can report to headquarters as surrogate measures of success consistent with regionally identified priorities. **(All measures are priority Regional activities.)**

- ▼ *Number of individuals/firms certified by EPA, states and tribes by discipline and the number of training providers accredited. This listing should also include the number of individuals/firms recertified by discipline and the number of training provider renewals that are processed.*
- ▼ *Number of programs that go from interim to full approval.*
- ▼ *Number of new state and tribes that are approved or disapproved to implement lead certification/accreditation programs.*
- ▼ *Numbers (with project details) of outreach activities related to the 406(b) program.*

Means and Strategies - Given that implementation priorities related to lead-based paint abatement

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certification and training programs vary from region to region, this guidance outlines the various program activities that are considered to be priorities that can be tailored by each region to fit the situation in their region. Regions should identify and explain their priorities for FY 2002/ '03/ '04 from the following list of activities:

- Continue to certify individuals/firms and accredit training providers for states and tribes which are not approved to implement a program. Provide feedback to headquarters on direct implementation funding needs and expenditures.
- Oversee state and tribal implementation of certification/accreditation programs including full administration of 404(g) grant programs which entails interaction with headquarters on funding needs, etc. Assist states/tribes on implementation issues that may require EPA guidance and direction.
- Work with state and tribal programs that have interim approvals to resolve any problems/issues that may hinder full approval prior to statutory deadlines. Interim approval concerns include resolving state audit/immunity conflicts and determining that enforcement programs are fully functional.
- Work with approved state and tribal programs to incorporate Section 403 mandated rule amendments into state/tribal regulations and/or ordinances.
- Conduct outreach to promote state and tribal programs to request approval to implement a program. For those programs that come in for approval, conduct reviews of the package, consult with headquarters on application decisions, and process necessary paperwork to approve or disapprove program submittals including the preparation of Federal Register notices.
- Conduct outreach to citizens, and renovation/remodeling contractors concerning Section 406(b) program requirements.
- Other region specific activities not captured in this list of activities. Please provide details in regional MOA documents.
- Provide assistance to state and tribal programs, and conduct outreach to Housing Authorities regarding certification requirements that may impact their activities initiated in response to HUD's 1012/1013 requirements.

Issues and Barriers

- ▼ Delays in the promulgation of various regulatory program changes such as amending the certification requirements to incorporate renovation and remodeling activities,

- promulgation of an abatement notification rule, as well as work on interpretive guidance related to the Section 403 lead-hazards.
- ▼ Reluctance of States to make changes to their regulations that they perceive may hamper implementation efforts resulting in challenges to their program from various constituents.
- ▼ Our piecemeal approach to making amendments to the certification requirements could result in states opening themselves up to scrutiny that could result in the loss of program authority.
- ▼ Continued availability of Section 404(g) funds and direct implementation funds.
- ▼ Mandated EPA resource shifts.
- ▼ Lack of adequate contractor support for the processing of certification and accreditation paperwork and having adequate support from staff at headquarters regarding processing of tribal and state program applications.

Activity: **Rule Development Work Related to Lead-based Paint Poisoning Prevention**

Objectives - For FY 2002/ '03/ '04, continue efforts to reduce exposure to lead-based paint hazards with intent to effect a significant decrease in overall blood-lead levels in children, through regional participation in headquarters rulemaking efforts to prepare rules on training, accreditation and certification requirements for renovation and remodeling activities, training, accreditation and certification requirements for lead-based paint activities in buildings and superstructures, lead abatement notification requirements, and other rulemaking efforts to assist with certification and accreditation efforts in the regions. Included in this objective are activities related to development of interpretive guidance for rules when promulgated such as the Section 403 lead hazards rule.

POLLUTION PREVENTION

National Goal: Integrate P2 into core federal, state, and tribal programs, and target the reduction of priority PBTs in regional programs and state grants.

Introduction

While continuing tasks associated with grants management, P2 integration into Regional and state programs, and projects supporting the Design for the Environment program, Regional P2 staff are also being asked for the first time to concentrate some efforts in the Regions to implement the Action Plans for PBT (persistent, bioaccumulative toxics) chemicals. In the initial stages of this new assignment, considerable support from headquarters will be essential.

RPG: Coordination of State and Tribal P2 Programs and Grants management. Manage the Pollution Prevention Incentives for States (PPIS) grant program and Pollution Prevention Resource Exchange (P2Rx) program, where applicable, to foster the sustainability of state and tribal P2 programs and to ensure that P2 is incorporated into state/tribal strategies and environmental service delivery systems. Where appropriate, support environmental justice through the application of pollution prevention approaches and technology. **(Priority Regional Activity)**

Regional Performance Measure: The estimated total amount of reductions in waste generated, resources used, or releases to the environment reduced that result from incorporating pollution prevention approaches in State and Tribal P2 programs.

RPG: Managing PBT Chemicals. Target the reduction of priority Persistent, Bioaccumulative and Toxic (PBT) chemicals, such as mercury, dioxins/furans, etc. in regional pollution prevention programs and state PPIS grants. Support and enhance regional PBT projects by promoting the use of prevention approaches and technologies to reduce priority PBTs. The PBT Initiative is an Agency-wide, multimedia effort to reduce the environmental burden and human exposure to these chemicals. (See guidance section on PBTi) **(Priority Regional Activity)**

Regional Performance Measures: As defined in PBT Initiative MOA Guidance.

RPG: Program Integration. Coordinate and communicate with other EPA programs to offer P2 solutions and assistance to make P2 the environmental strategy of choice.

Regional Performance Measures: The estimated total amount of pollution reduced, in pounds, that result from incorporating pollution prevention approaches in SEPs, permits, voluntary partnership programs, compliance assistance activities or in any other Regional activity through which pollution prevention can be promoted.

RPG: Regional Priorities. Promote P2 in business/government/individual practices through demonstration projects, technical assistance and outreach. The priority Regional activities that should be the focus of such efforts include:

- Partnership programs with or technical assistance directed at priority sectors, geographic areas, schools or other educational institutions, or specific facilities
- Promoting P2 in Federal agencies including Environmentally Preferable Purchasing
- Promoting Environmental Management Systems
- Refining and developing P2 measurement tools

Regional Performance Measures: - The estimated amount of pollution reduced or prevented as a result of project activities, outreach or technical assistance effort.

RPG: Design for the Environment. Expand the use of cleaner technologies in priority industries through outreach.

Regional Performance Measures: The estimated amount of pollution reduced or prevented through Regional projects fostering the use of cleaner technologies or safer substitutes.

Headquarters Commitments

- Technical expertise needed to assist the Regions in P2/DfE projects
- Outreach materials for PBT chemicals
- Region-specific mailing lists of, for example, hospitals for PBT mailings
- Monthly communications with Regional PBT and P2 Coordinators
- Provide speakers for conferences, etc., as requested by the Regions
- Gather from OECA information from SEP database

PREVENTING AND REDUCING PRIORITY PBTS IN THE ENVIRONMENT

National Objectives:

In 2002/ '03/ '04, produce measurable results in reducing the use, releases, and exposure of priority PBT pollutants. Focus especially on Mercury, Dioxin, PCBs, and the Level I Pesticides. See draft PBT National Action Plans for specific reduction goals and priority activities for the Level I PBT pollutants.

Introduction:

Persistent, bioaccumulative and toxic (PBT) pollutants are a national health and environmental problem. Addressing these pollutants is particularly difficult because of the ability of many of them to transfer rather easily among air, water and land, and to span the boundaries of regulatory programs, geography and generations. The best way to address pollutants that cross environmental media is to set priorities cross-media and to actively coordinate activities among EPA's media programs in HQ and the Regions.

Under the Agency's PBT Initiative (PBTI), draft multimedia National Action Plans have been developed for most of the 12 Great Lakes Binational Toxics Strategy (BNS) Level I priority PBTs (Mercury, PCBs, Pesticides (aldrin/dieldrin, chlordane, DDT, toxaphene, mirex), benzo(a)pyrene, hexachlorobenzene, alkyl-lead, and octachlorostyrene.). Development of a Dioxin plan is now underway.

As a multi-office targeting effort, the PBTI's purpose is to achieve maximum risk reduction associated with these 12 priority pollutants by utilizing all of the Agency's tools (voluntary, regulatory, prevention, compliance assistance, enforcement, international) in a coordinated manner. Because PBT activities exist within several different Program Offices, they respond to several different GPRA goals. Efforts should be made to address priority PBTs in all appropriate regional activities, including pollution prevention, use and emission reduction, and compliance assistance/enforcement activities. Additional guidance is available in the PBTI Strategy and the PBT National Action Plans.

Strategies and Measures of Success:

In the MOA Agreement developed in FY 2001, each Region should describe the major known priority PBT problems in the region and how the specific activities chosen will best address those problems. (Regional programs should work with Regional PBT Contacts to do this.) Please

note that #1 of the following activities below provides wide discretion for regions while the others are more targeted. If Regions choose #1, please specify the specific PBT substance(s), sector(s), and activities chosen. Regions should choose at least one of the following activities:

1. Support Projects that will most effectively prevent or reduce priority PBTs in the environment and make the most progress toward achieving the environmental goals and priorities specified in the PBT National Action Plans.

For instance, regions can select industries, facilities, and sectors that have high use and/or releases of Mercury, PCBs, or other priority PBTs in the region, and partner with them to identify releases and sources and to prevent or reduce releases in all media. Regions can work with supply chains to stop the use of PBTs in devices and products (e.g., manometers, switches, thermostats, electronic components). Whenever possible, Regions should build on existing partnerships with industry, such as the Region 5 MOU with three Indiana iron and steel plants, the Region 5 partnership with auto manufacturers and their supply chains, and the HQ partnership with GM and Saturn to eliminate or reduce PBTs in the supply chain.

Regions report:

PBT(s), Sector (s), and description of activities

partnerships to reduce PBTs.

Amount/% of lbs of specific PBTs reduced.

2. Partner with hospitals and other health facilities to reduce Mercury in wastestreams following the process established under the Hospitals for a Healthy Environment (H2E) program.

Involves working with the State Hospital Associations and State Technical Assistance Providers to get hospitals or other health facilities to pledge to reduce Mercury waste to meet the goals of the H2E MOA; provide technical assistance directly or indirectly from the State Technical Assistance Providers and H2E effort; and track progress in reducing Mercury use and waste. Disposal/recycling must be safely managed. See www.h2e-online.org/ for a description of the H2E project. The H2E goals are: virtual elimination from hospitals of mercury waste by year 2005, reduction of total waste volume from hospitals by 33% by 2005, 50% by 2010.

Regions report:

Hospitals and/or other health facilities partnered with.

Amount/% Mercury use and waste reduced per hospital or facility. The baseline year is 2001.

Amount/% Total waste volume reduced per hospital or facility. The baseline year is 2001.

3. Partner with educational centers to reduce Mercury use and releases. This involves educating teachers and school officials about the risks associated with mercury, and the role their

school can play by reducing mercury use and releases. It consists of getting mercury awareness implemented in school curriculum (k-12), getting schools to purchase non-mercury or low-mercury containing devices, instructing schools on proper use, storage, disposal of mercury containing devices, and proper spill clean-up techniques. (During 2001, OPPTS is funding a contractor to conduct some initial regional training workshops on educating teachers and school officials similar to ones conducted in Region 5.) See www.mercury-k12.org/ for steps to take to inventory and remove mercury from schools.

Schools partnered with

Amount/% of Mercury collected per school.

outreach activities on reducing Mercury use in schools, including a description of the type of outreach activities performed.

4. Support PCB projects described under Safe PCB Disposal of this MOA Guidance document, specifically on decommissioning PCB transformers and capacitors. Regions report under that measure.

Additional Information Needed from Regions in EOY Reports

1. A list of ongoing and completed projects; short descriptions of the projects, which include the PBT(s), use(s), sector (s), overall project results and progress, successes and opportunities for improvement; and reports on the specific measures listed under Strategies and Measures of Success.

2. A brief description of what cross-office coordination mechanism the region is using to address PBTs in a holistic manner. In other words, how is the region setting priorities and coordinating activities across the media programs. This coordination is critical given the cross-media and cross-boundary nature of PBTs, and thus the need to have a coordinated cross-program approach.

Contacts:

Regional program offices should work with their Regional PBTI coordinators to coordinate projects across programs and to report the above information.

The list of Regional PBT contacts is available from Paul Matthai, OPPTS, 202-260-3385. Phone numbers for Tom Murray and Sam Sasnett, OPPTS, are 202-260-1876 and 260-8020 respectively. Above reporting should be sent to OPPTS because it coordinates the PBTI across OAR, OW, OSWER, OECA, ORD, and OPPTS.

Issues and Barriers:

The barrier to success is that this is a multi-media problem that requires participation from all HQ and Regional program offices. The more we can set joint priorities across EPA programs and engage the states, industry, environmental and other groups to leverage ongoing PBT activities, the more we can reduce PBTs in the environment.

HQ Commitments:

1. In FY2001, OPPTS will hold one or more HQ/Regional planning meetings to discuss working with sectors, such as hospitals, schools, iron and steel, automotive and other sectors on PBTs. The meetings will focus on how best to get good regional-specific PBT projects replicated in other regions, and will identify regional information needs.
2. In FY2001, the PBT website (www.epa.gov/PBT) will post documentation of existing regional efforts, including additional information about how regions can participate in the H2E and Mercury-in-Schools projects.

NEW CHEMICALS AND MICROORGANISMS REVIEW/CHEMICAL RIGHT-TO-KNOW

National Goal: To gather screening information on HPV chemicals and more in-depth data on VCCEP chemicals

Introduction

As of January 1, 2003, EPA will be continuing its implementation of Core TSCA programs, including Section 4 testing, Section 5 new chemical screening and control, existing chemical risk management, Section 8 information gathering, Section 12 export notification, and Section 13 chemical import certification.

Voluntary programs, such as the High Production Volume (HPV) Challenge and the Voluntary Children's Chemical Evaluation Programs (VCCEP) of the Chemical Right-to-Know Initiative should also be moving apace. Through the HPV Challenge Program, 460 companies and 187 consortia have pledged to provide screening level health and environmental effects data for 2,155 industrial HPV chemicals. Test plans and robust summaries are provided by companies and consortia participating in the HPV Challenge Program. This information is posted on the ChemRTK website (www.epa.gov/chemrtk) upon receipt. The test plans and robust summaries are then reviewed by the Agency and other stakeholders in a 120-day public review period. We need to maintain the established framework that provides the public with timely access to test plans and test results as they are generated, as well as any summaries of the data that characterize each chemical. This will be an ongoing data collection effort.

RPG: By the end of 2002:

- Appropriate communication channels (between HQ=Regions, intra-region, as well as with the states and other any other organizations or agencies) should be in place. This will enhance our ability to collect additional hazard, exposure, use, or release data and make such data available to the interested public in the appropriate context.
- Outreach to all major stakeholders, specifically targeting other regional programs, the scientific community, higher educational institutions, and states to promote and facilitate the use of HPV data will be initiated.

Measure: Presentations and meetings held to inform internal and external stakeholders that ChemRTK data are available and to work with them on

how the data are presented and how they might be used.

Measure: Number of states programs informally agreeing to promote the use of ChemRTK data among their respective state counterparts as they become available on the ChemRTK Website.

RPG: By the end of 2004:

- ▼ Outreach to all major stakeholders, including the scientific community, higher educational institutions, and states to facilitate the use of HPV data will continue.
- ▼ Upon receipt of hazard data identifying chemicals of concern, Regional and appropriate State agencies will be canvassed for additional exposure and use information that may be available to facilitate further evaluation.
- ▼ A network of stakeholders with specific interests in specific chemicals or categories will be developed.
- ▼ A regional strategy for dealing with outreach needs associated with the Voluntary Children's Chemical Evaluation Program will be developed.

Measure: Presentations and meetings held to inform stakeholders that ChemRTK data will soon be available and to work with them on how the data are presented and how they might be used.

Measure: Number of states programs informally agreeing to promote the use of ChemRTK data among their respective state counterparts as they become available on the ChemRTK Website.

Means and Strategies

- The regions will participate on workgroups where appropriate on ChemRTK initiatives. Develop a close working relationship between OPPT and regional toxics programs in order to implement ChemRTK/Core TSCA responsibilities;
- continue to promote participation in voluntary programs;
- research and provide regional/state exposure/hazard/chemical release and use information when available for chemicals of concern;

- develop strong working relationships with regionally located sponsor companies and consortia. Continue to promote the HPV Challenge Program with companies that have chosen not to participate as sponsors but are associated with HPV chemicals. Provide assistance and support in addition to that currently sustained by Headquarters;
- start promoting the potential availability of the data by disseminating information on the program to the scientific community and higher level education institutions.

Issues and Barriers

Regional resource constraints may be an obstacle to success in this area, since OPPT Regional FTE are currently focused on other programs. The severe reduction in many Regional Core TSCA Enforcement Programs due to the recent OECA small program reorganization will contribute to this challenge.

Availability and accessibility of additional hazard or exposure data may not exist or may not be in a form useful to the program.

Headquarters Commitments

- ▼ Continue to maintain ChemRTK website so all parties can have up-to-date information on both the progress of the program and the available information on HPV and VCCEP chemicals
- ▼ Develop with the Regions a Budget Initiative for FY2003 on ChemRTK that will include increased resources for Regional programs
- ▼ Provide in-depth briefing for all Regions

DURABLE FIBERS

National Goal: To reduce the exposure of the public to toxic fibers.

Introduction

It is likely that the fibers program will continue, both at headquarters and in the Regions. In order to maximize the impact of the program, it will be joined with other efforts into a “schools initiative,” probably in FY03. Until then, the program should attempt to remind schools of their obligations for the removal or containment of asbestos problems. We envision that this will principally be an outreach effort, with no more than one or two visits to school boards and/or PTA meetings to explain what needs to be done.

RPG: Reduce exposure of children to asbestos fibers through a coordinated education approach to school staff.

Measure: Number of school children potentially affected via presentations, mailings, e-mail, and/or phone

Means and Strategies

- Contact other EPA programs to develop a unified outreach approach in partnership with the Office of Children’s Health. (FY02)
- Identify the elements of a successful Asbestos in Schools outreach program. (FY02)
- Seek resources to implement the outreach program in ‘03/ ‘04.
- Give presentations at professional schools conferences (charter schools, PTAs, etc.) (FY02-04)
- Conduct mass mailing to schools in each Region. Priority to charter schools. (FY03)
- Develop “user-friendly” websites possibly geared to various sectors, such as schools, home-owners and the construction industry. (FY02)
- Make contact with schools via E-mail. (FY02-04)
- Provide assistance to schools by phone as needed. (FY02-04)

Barriers and Concerns

- Resources
- Willingness of school professional conferences to allow EPA on the agenda.
- Quality of mailing addresses so that appropriate school contact receives information.
- “Stove-piped” structure of Agency Programs.
- Lack of trust with schools because asbestos is perceived as “enforcement”.

RPG: By 2003/ 04, the Regions with States still unapproved, but willing to apply for approval under the MAP, will make progress toward that end.

Measure: Increase in number of States with MAP approval or a pending application

Means and Strategies

- Contact States that are unapproved to determine willingness to apply for approval.
- Investigate the possibility of providing grant money for State program development.
- Provide grant money if available.
- Ensure that Regional Counsel and all necessary management are briefed before the application is received, so that the processing can be expedited when it arrives.
- Review application and associated rules and approve State under the MAP.

Barriers and Concerns

- State political atmosphere or State agency policy may resist making this change, especially this late in the process.
- Existing Regional grant funds may be committed to other States or programs.

RPG: Increase number of properly trained individuals who will enter the abatement workplace.

Measure: Number of people trained per year in the discipline of the course audited by EPA.

Means and Strategies

- Develop audit target list.
- Take advantage of SEE resources.
- Conduct audits and provide feedback to training provider.

Barriers and Concerns

- Resources

Headquarters Commitments

- Investigate updating school mailing lists for the Regions
- Inventory available outreach materials, printing more as required
- Providing outreach materials and, if available, mailing lists to each Region

PCBs

Goal 4.2.2 Safe PCB Disposal

Introduction

This fully-mature program will continue as before for FY02-04. Regions are encouraged to make any efforts possible to help industries retire PCB-laden transformers and capacitors earlier than planned.

RPG: By 2003/ '04, Regions will effect reduction of the amount of PCB Transformers and Capacitors in use consistent with the PBT Action Plan for PCBs.

(Baseline: 1.85 million capacitors, 2.2 million transformers
Targets: 20,000 transformers, 35,000 capacitors -
FY 2002 Current Services Budget)

Measure:

-- *Number of PCB Transformers and Capacitors disposed per year.*

(Target numbers to be based on HQ analysis of data from last three years available.¹)

RPG: In 2002/ '03/ '04 Reduce the industrial burden and costs of managing the safe disposal of PCBs.

Measures:

-- *Number of risk-based PCB disposal approvals issued.*

-- *Acres of property to be remediated under issued approvals.*

-- *Cost savings of decontamination vs. disposal to be gained under issued approvals.*

RPG: PCB remediation sites are cleaned up correctly.

¹Quantity data not available until July of following year and must be consolidated.

Measures:

- *Number of 761.61(a) self-implemented cleanups reviewed.*
- *Acres of property to be remediated under reviewed approvals.*

RPG: PCB waste is properly stored and disposed.

Measures:

- *Number of PCB commercial storage and disposal approvals issued.*
- *Pounds of PCBs shipped from Commercial Storers and pounds of PCBs disposed per year.²*

Means and strategies

Potential releases of PCBs to the environment can be avoided by removing existing equipment from service and properly disposing of it. Remediation of PCB sites protects health and the environment from exposure to PCBs. Compliance with the PCB regulations is improved through effective communication.

Commercial storage approvals and disposal approvals will be reviewed and issued.

Risk-based disposal approvals will be reviewed and issued.

Compliance assistance will be easily available through mailings, seminars and telephone assistance.

Region 2, as the sublead in this program, will participate, and encourage other Regions to participate, on regulatory workgroups. Region 2 will coordinate regional input for PCB regulations/ authorizations and initiatives related to OPPT.

OPPTS and OECA will coordinate enforcement and program objectives through the MOA process.

Regions will initiate development or adoption of PCB phase-out initiatives as outlined in the Persistent Bioaccumulative Toxics (PBT) National Action Plan for PCBs. OPPT and OECA will assist in transferring successful regional programs to other regions.

²Quantity data not available until July of following year and must be consolidated.

Issues and Barriers

Outstanding issues in the 1998 PCB Disposal Amendments must be identified and addressed, where agreed, as promptly as possible. The Regions, OPPT, and OECA can work together to raise and resolve issues and problems related to the PCB disposal amendments.

Regional resources must be adequate to address disposal and commercial storage approvals and basic enforcement workload as a minimum.

Resources for review of risk-based approvals must be adequate.

Headquarters Commitments

- Provide needed technical expertise to assist the Regions
- Provide needed technical interpretations of PCB rules
- Assist OECA in the enforcement of PCB regulations

TRIBAL PROGRAMS

OPPTS National Objective: EPA will help in building the tribes' capacity to implement environmental management programs, and EPA will work toward implementing programs in Indian country where needed to address environmental issues.

Introduction

During FY2001 -'03 OPPTS, OPPT, OPP, and the Regions will develop a national Tribal Strategy. The remainder of the MOA period will be devoted to implementing that Strategy.

Regional Performance Goal: For FY 2002/'03/ '04, OPPTS, OPPT, OPP and the Regions will work toward implementation of toxics and pesticides programs in Indian Country and assist the Indian tribes in building the capacity to implement critical environmental management programs as described in the OPPTS Tribal Strategy.

Measures:

- *The increase in the number of toxics and/or pesticides programs being pro-actively implemented by EPA in Indian Country.*
- *The increase in the number of Indian tribes awarded capacity-building grants for toxics and pesticides program development and implementation.*
- *The increase in the number of asbestos, Pb and pesticide program authorizations.*

Means and Strategies:

Effectively implement the OPPTS Tribal Strategy. OPPTS and the Regions reaffirm their commitment to the Indian tribal program through educating managers and staff on tribal issues (i.e. trust responsibilities, tribal needs and program capacity, cultural issues, jurisdiction, etc.) and through the direct implementation of toxics and pesticides programs. In order to effectively implement EPA programs within Indian country and assist the tribes in building program capacity, OPPTS and the Regions need to explore and implement different methods for increasing communication with and dissemination of educational material and technical assistance to the diverse tribes. Based upon limited Agency resources and regulatory and jurisdictional constraints, OPPTS needs to develop an effective method of prioritizing programs and leveraging internal and external resources. Explore mechanisms to address limiting issues such as jurisdictional constraints. Efforts should focus on cross-program coordination and cooperation.

Issues and Barriers

Agency culture of dealing with the states and not the Indian tribes.

Lack of knowledge by managers and staff of trust responsibilities, jurisdictional and cultural issues, etc..

Limited resources

Generally low priority for OPPTS' programs within the tribes as compared with air, water, and solid waste.

OPPTS' programs are generally "stove pipe" by nature, therefore increasing coordination and cooperation problems and efforts.

Jurisdictional and statutory limitations on program authorization.

Headquarters Commitments

- Work with Regions to develop comprehensive Tribal Strategy during '01/'02/ '03.